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ABSTRACT

This manual is designed to aid vocational education personnel in eliminating unlawful discrimination from vocational education programs, services, and activities. A mixed-media kit, it includes a user handbook, a set of transparency masters, and a set of audience handout masters. These components are formatted in question-and-answer style to facilitate speaker presentation of the basic Office of Civil Rights Guidelines concepts, issues, and requirements for nondiscrimination in vocational education programs. The 51 questions group around these topical areas: overview questions; requirements for the state agency; requirements for vocational education programs; and requirements for proprietary schools. These topical areas cut across the concerns of vocational educators and the issue of nondiscrimination in terms of policy, funding, monitoring, access to facilities, access to programs, equal educational opportunity, and student employment. Resources have been selected for the topical areas. (KC)

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Research and Development Series No. 205

51 QUESTIONS
ON THE OCR GUIDELINES

Prepared by

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January 1981

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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FOREWORD

51 Questions on the OCR Guidelines is an interpretive kit intended to create basic awareness of civil rights requirements for vocational education programs, services, and activities. The kit should be of interest to all vocational educators, including teachers, administrators, federal agency personnel, researchers, and the National Center staff.

It is one of several products developed during the third year of the National Center's knowledge transformation program. The review and synthesis in each topic area is intended to communicate knowledge and suggest applications. The series should be of interest to all vocational educators, including teachers, administrators, federal agency personnel, researchers, and the National Center staff.

The profession is indebted to Raymond E. Harlan for his scholarship in preparing this kit. Recognition is also due Douglas Adamson, Director, State Office of Civil Rights, New York; Lloyd Alston, Assistant Superintendent of Vocational Education, Baltimore City Public Schools; and R. Michael Morris, the National Center for Research in Vocational Education, for their critical review of the manuscript. Staff assistance was contributed by Shelley Grieve, Dr. Carol Kowle, and Alta Moser. Editorial assistance was provided by the Field Services staff.

Robert E. Taylor
Executive Director
The National Center for Research
in Vocational Education

EXECUTIVE SUMMARY

51 Questions on the OCR Guidelines is designed to aid vocational education personnel in eliminating unlawful discrimination from vocational education programs, services, and activities. This working manual is a mixed-media kit that includes a user handbook, a set of transparency masters, and a set of audience handout masters. These components are formatted in question and answer style to facilitate speaker presentation of the basic concepts, issues, and requirements for nondiscrimination in vocational education programs contained in the Office for Civil Rights Guidelines.

The fifty-one questions group around these topical areas: Overview Questions; Requirements for the State Agency; Requirements for Vocational Education Programs; and Requirements for Proprietary Schools. These topical areas cut across the concerns of vocational educators and the issue of nondiscrimination in terms of policy, funding, monitoring, access to facilities, access to programs, equal educational opportunity, and student employment. Resources have been selected for the topical areas.

INTRODUCTION

This kit has been designed to meet the needs of vocational educators at all levels in presenting the main provisions of the Office for Civil Rights Guidelines. The Guidelines were issued to assist vocational educators in eliminating unlawful discrimination from vocational education programs, services, and activities. The Guidelines, as agency regulations, have the status and effect of law; hence, the provisions of the Guidelines impact on vocational education programs at all levels. We all need to know what the Guidelines say. This kit is designed to meet this need for knowledge.

The kit has three components: this handbook, a set of transparency masters for overhead projectors, and a set of audience handout masters for duplication. These three components are interrelated.

The handbook provides a question and answer text in a format that suggests leads you might use to get across the main concepts of the Office for Civil Rights Guidelines to a selected audience. Summary remarks of the text are provided, too, and appear in the margins.

The overhead projector transparency masters are keyed and titled. You may wish to use a transparency made from the master at the point indicated in the handbook. The use of a particular transparency is suggested by its key number in the margin of the handbook text, flagged with a ▲.

The audience handout masters are also keyed and titled. You may wish to use an audience handout made from the master at the point indicated in the handbook. The use of a particular audience handout is suggested by its key number in the margin of the handbook text, flagged with a ◆. The audience handout masters provide material for discussion or reflection by your selected audience.

The separation of the three components of your kit enables you to use it with the greatest flexibility relative to your audience, your interests, and your presentation objectives. By all means, use the components of the kit as best serves your purposes.

A note area has been provided beneath each question of the text, providing room for your own personal notes.

Selected resources have been provided at the end of a section for further reading.

LIST OF ALL QUESTIONS

OVERVIEW QUESTIONS (Questions 1-7)

1. What are the OCR Guidelines?
2. Why were the Guidelines issued?
3. Who is affected by the Guidelines?
4. What do the Guidelines mean to program personnel?
5. When do the Guidelines take effect?
6. What are the Guidelines all about?
7. What topics are discussed in the Guidelines?

REQUIREMENTS FOR THE STATE AGENCY (Questions 8-19)

A National Policy (Questions 8-12)

8. Is there a national policy?
9. What does the principle of nondiscrimination mean?
10. Where has unlawful discrimination been found?
11. What do the Guidelines prohibit?
12. What is required to eliminate unlawful discrimination?

Funding (Questions 13-16)

13. Are there funding constraints?
14. What type of funding is discriminatory?
15. What happens when discriminatory funding is found?
16. What other funding areas need consideration?

Monitoring (Questions 17-19)

17. How does the state agency monitor recipients?
18. Does noncompliance mean funds stop?
19. Does the state agency have other obligations?

REQUIREMENTS FOR VOCATIONAL EDUCATION PROGRAMS (Questions 20-43)

Access to Facilities (Questions 20-28)

20. What topics do access and admissions include?
21. What restrictions are placed upon admissions policies?
22. How does locale affect equality of educational opportunity?
23. What restrictions affect the selection of sites?
24. What restrictions affect school boundaries?
25. What restrictions affect additions or renovations?
26. What must be done to remedy a discriminatory school location?
27. When is a vocational education center presumed to be unlawfully segregated?
28. How can segregated facilities be remedied?

Access to Programs (Questions 29-32)

29. What criteria may not be used for admitting students?
30. How can administrators provide equal access to persons speaking limited English?
31. How can persons who speak limited English be identified?
32. How can administrators provide equal access to handicapped students?

Equal Educational Opportunity (Questions 33-39)

33. Must administrators announce a policy of nondiscrimination?
34. What points should this announcement contain?
35. What equal opportunity provisions are emphasized?
36. What accommodations must be provided for handicapped students?
37. How is student financial assistance restricted?
38. How is housing in residential postsecondary vocational education centers restricted?
39. To what extent must comparable facilities be provided?

Student Employment (Questions 40-43)

40. What role do agencies have in equal work experience opportunity?
41. What responsibilities do agencies have for student employment opportunities?
42. Are agencies prohibited from entering into agreements with apprenticeship sponsors?
43. What are the key provisions of the sponsor's assurance?

Requirements for Counselors (Questions 44-48)

44. Which functions of counseling are discussed?
45. What responsibility do agencies have for counseling and prevocational programs?
46. What direction can agencies provide counselors?
47. What responsibility do agencies have for student recruitment activities?
48. What obligation do agencies have for promotional activities?

Miscellaneous (Questions 49-51)

49. What obligation do agencies have to their faculty and staff?
50. Are proprietary vocational education schools covered?
51. Where can I get help with the Guidelines?

OVERVIEW QUESTIONS (Questions 1-7)

1. What are the OCR Guidelines?
2. Why were the Guidelines issued?
3. Who is affected by the Guidelines?
4. What do the Guidelines mean to program personnel?
5. When do the Guidelines take effect?
6. What are the Guidelines all about?
7. What topics are discussed in the Guidelines?

QUESTION 1

WHAT ARE THE OCR GUIDELINES?

- Guidelines is shorthand for Office for Civil Rights "Guidelines for Eliminating Discrimination and Denial of Services on the Basis of Race, Color, National Origin, Sex, or Handicap in Vocational Education Programs" (*Federal Register,* Vol. 44 (March 21, 1979), pp. 17, 162-17, 175; hereafter cited as *Federal Register*).

Guidelines
▲ 1

- The intent of the Guidelines is to assist administrators in eliminating discrimination and denial of services in vocational education programs and activities.

Assist administrators

- The Guidelines were issued by the Office for Civil Rights, Department of Health, Education, and Welfare, to explain the civil rights responsibilities of state and local agencies that administer or offer vocational education programs.

Explain civil rights obligations

- The Guidelines provide guidance to administrators about the requirements of TITLE VI of the Civil Rights Act of 1964 (P.L. 88-352); TITLE IX of the Education Amendments of 1972 (P.L. 92-318); and Section 504 of the Rehabilitation Act of 1973 (P.L. 93-112). The guidelines explain how these laws apply to vocational education policies, programs, and activities.

Provide guidance
▲ 2 ▲ 3 ▲ 4
♦ 1

Explain application of laws

- The Guidelines provide a framework for a national policy of nondiscrimination in vocational education programs and activities.

Provide policy framework

NOTES

▲ = Transparency
♦ = Handout

QUESTION 2

WHY WERE THE GUIDELINES ISSUED?

- The fact of unlawful discriminatory practices in vocational education programs and activities provided an impetus to issue the Guidelines. During compliance reviews of vocational education schools, the Office for Civil Rights identified civil rights violations during its 1973–78 survey.

Factual basis: discrimination in programs

- Legal proceedings and court litigation provided a second impetus to issue the Guidelines. As a result of *Adams v. Califano* (1973), the Department of Health and Human Services must enforce civil rights legislation in vocational education programs by means of compliance reviews, surveys of enrollment data, and the publication of guidelines.

Legal basis: court litigation

NOTES

QUESTION 3

WHO IS AFFECTED BY THE GUIDELINES?

- The Guidelines apply to recipients of federal financial assistance that administer or offer vocational education programs or activities.

Apply to recipients

- "Recipient" includes state and local education agencies and schools.

State and local agencies and schools

- The Guidelines affect boards of education for public school districts, administrative boards for specialized vocational schools, and administrative boards for technical vocational schools.

Examples of agencies

- The Guidelines also apply to junior colleges, community colleges, four-year colleges providing vocational training, and a variety of secondary and postsecondary vocational education institutions.

Examples of schools

NOTES

QUESTION 4

WHAT DO THE GUIDELINES MEAN TO PROGRAM PERSONNEL?

- The Guidelines mean a cooperative effort by all vocational education personnel at the state and local levels to end unlawful discrimination.

A cooperative effort to end discrimination

- The Guidelines mean an obligation on the part of vocational education personnel to provide equal opportunity to all applicants, students, and staff of vocational education programs.

An obligation to provide equal opportunity

- The Guidelines mean a commitment by all vocational education personnel to correct past unlawful discrimination and to guard against future unlawful discrimination in vocational education policies, programs, and activities.

A commitment to attain and obtain compliance

NOTES

QUESTION 5

WHEN DO THE GUIDELINES TAKE EFFECT?

- The Guidelines went into effect on March 15, 1979, and they remain in effect indefinitely or until amended or modified by law or regulation.

NOTES

Effective date
▲5

▲ = Transparency

QUESTION 6

WHAT ARE THE GUIDELINES ALL ABOUT?

- The Guidelines are all about what vocational education personnel can and must do to eliminate unlawful discrimination based on race, color, national origin, sex, or handicap in vocational education policies, programs, and services.

End discrimination in vocational education

- The Guidelines are all about people and about how "being a person" correlates with getting an equal chance to be an individual.

Equal opportunity for people

- The Guidelines are all about what the leaders in vocational education policy or programs and decision-making processes must do to ensure that each and every person counts individually and equally in vocational education.

Every person counts equally

- To make each individual count, leaders must ensure that race, color, national origin, sex, or handicap are not used as factors on which to make policy decisions, except to overcome or remedy the effects of past discrimination.

Race, color, national origin, sex, or handicap not basis for decisions

- Leaders must ensure that no decision of policy results in unlawful discrimination against the members of the vocational education community or results in the denial of services or benefits of vocational education programs to any individual.

NOTES

QUESTION 7

WHAT TOPICS ARE DISCUSSED IN THE GUIDELINES?

- The Guidelines begin with "Supplementary Information." This preface states the legal and factual bases for the Guidelines. The contents of the Guidelines spreads across nine sections.

- *Section I: Scope and Coverage* defines "recipient" and gives examples of education agencies and schools that are affected by the Guidelines.

- *Section II: Responsibilities Assigned Only to State Agency Recipients* states the chief civil rights responsibilities of receivers of federal dollars and gives a statement of procedures and practices.

- *Section III: Distribution of Federal Financial Assistance and Other Funds for Vocational Education* focuses on the requirements for the distribution of federal dollars, allocation formulas, and awarding of grants or contracts.

- *Section IV: Access and Admission of Students to Vocational Education Programs* addresses policy and program requirements for the location of facilities, admissions standards, and vocational education opportunities for limited-English-speaking national minorities and for handicapped persons.

(continued)

NOTES

Question 7, continued

What Topics Are Discussed in the Guidelines?

- *Section V: Counseling and Prevocational Programs* provides guidance for eliminating discriminatory counseling practices and promotional materials by providing students with equal opportunity in career selections.

- *Section VI: Equal Opportunity in the Vocational Education Instruction Setting* covers the accommodation of handicapped students in vocational education programs, the requirements of postsecondary residential housing, student financial assistance, and comparable facilities.

- *Section VII: Work Study, Cooperative Vocational Education, Job Placement, and Apprentice Training* discusses the employment of students in businesses and industries and the conditions for student participation in apprenticeship training programs.

- *Section VIII: Employment of Faculty and Staff* provides guidelines for the equal treatment of faculty and staff in recruitment practices, salaries, and advancement opportunities.

- *Section IX: Proprietary Vocational Education Schools* focuses on private schools that provide vocational education and that are subject to the Guidelines.

NOTES

REQUIREMENTS FOR THE STATE AGENCY
(Questions 8-19)

A National Policy (Questions 8-12)

8. Is there a national policy?
9. What does the principle of nondiscrimination mean?
10. Where has unlawful discrimination been found?
11. What do the Guidelines prohibit?
12. What is required to eliminate unlawful discrimination?

SELECTED RESOURCES: A NATIONAL POLICY

Ahmann, J. Stanley. *Needs Assessment for Program Planning in Vocational Education.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 544

Becker, Richard J. "What Are the Objectives of Vocational Education?" *Phi Delta Kappan* 61 (April 1980):534-536.

Education Amendments of 1976, P.L. No. 94-482, 90 Stat. 2081.

Grasso, John T. *Impact Evaluation in Vocational Education: The State of the Art.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 547

Kaplin, William A. *The Law of Higher Education: Legal Implications of Administrative Decision Making.* San Francisco: Jossey-Bass, 1979.

Laws Relating to Vocational Education and Agricultural Extension Work. Vol. 11: 92d and 93d Congress. Washington, DC: U.S. Government Printing Office, 1975.

Lee, Arthur M. *Use of Evaluative Data by Vocational Educators.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 546

Shannon, Thomas A. *The Role of Local School Boards in the Development and Direction of Programs of Occupational Education.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 186 708

Stevens, David W. *The Coordination of Vocational Education Programs with CETA.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 541

Technical Assistance Manual for Civil Rights in Vocational Education. Raleigh, NC: North Carolina Department of Public Instruction, Division of Vocational Education, 1980.

Vocational Education and National Institute of Education Amendments of 1976. H.R. 12835, 94th Congress, 2nd Session. (1976).

QUESTION 8

IS THERE A NATIONAL POLICY?

- Yes. The Guidelines state a national policy of nondiscrimination in vocational education programs and activities.

A national policy
▲6

- This national policy can be stated as the "Principle of Nondiscrimination": Recipients of federal money cannot engage or participate in unlawful discrimination.

"Principle of Nondiscrimination"

- This national policy of nondiscrimination in vocational education programs or activities is the law.
- The law mandates equality of educational opportunity for each applicant or student in vocational education.

Equal opportunity is the law.

NOTES

▲ = Transparency

QUESTION 9

WHAT DOES THE PRINCIPLE OF NONDISCRIMINATION MEAN?

- At the state level, the principle of nondiscrimination translates into an obligation upon state education agencies to identify, prevent, and remedy unlawful discrimination in vocational education programs.

NOTES

Identify, prevent, remedy discrimination
▲ 7

▲ = Transparency

QUESTION 10

WHERE HAS UNLAWFUL DISCRIMINATION BEEN FOUND?

- During 1973-78 compliance reviews, OCR staff found unlawful discrimination in vocational education programs in several areas.

a. Eligibility requirements, such as residence within a geographic area or admissions tests, deny vocational education opportunities on the basis of race, color, national origin, or handicap.	Admissions
b. Handicapped students are unlawfully assigned to separate annexes or branches; they are also denied equal vocational education opportunities as a result of inaccessible facilities, inadequate facilities, and inadequate evaluation procedures.	Separate schools
c. Vocational schools established for students of one race, national origin, or sex continue as essentially segregated facilities.	Segregated schools
d. National origin minorities with limited proficiency in English are denied equal opportunity to participate in vocational programs.	Language skills
e. Vocational education administrators often fail to adequately protect against discrimination in the placement of students with employers.	Student placement
f. Faculty and staff are assigned to vocational programs on the basis of race, national origin, sex, and handicap *(Federal Register)*.	Faculty and staff employment

NOTES

QUESTION 11

WHAT DO THE GUIDELINES PROHIBIT?

- Vocational education administrators must not require, approve of, or engage in any unlawful discrimination on the basis of race, color, national origin, sex, or handicap in four principal areas: funding, policy, administration, and conducting programs.

Must not require, approve of, or engage in discrimination

- In the fiscal area, vocational education administrators must not devise funding criteria and formulas which discriminate in the distribution of vocational education funds to local agencies.

Funding

- In the policy area, vocational education administrators must not establish requirements for admission or for administration which discriminate.

Decision-making

- In the area of administration, vocational education administrators must not approve actions by local agencies which discriminate.

Administration of programs

- In the area of conducting programs, vocational education administrators must not deny equal opportunity to applicants, students, or employees.

Equal employment opportunity

NOTES

QUESTION 12

WHAT IS REQUIRED TO ELIMINATE UNLAWFUL DISCRIMINATION?

- The significance of the national policy of nondiscrimination at the state level is in two major areas of program administration.

- First, administrators "that administer grants for vocational education must distribute federal, state, or local vocational funds so that no student or group of students is unlawfully denied an equal opportunity to benefit from vocational education on the basis of race, color, national origin, sex, or handicap" *(Federal Register).*

Distribute funds without discrimination

- Second, "the state agency responsible for the administration of vocational education programs must adopt a compliance program to prevent, identify, and remedy discrimination on the basis of race, color, national origin, sex, or handicap" by those who receive funds from the state agency *(Federal Register).*

Adopt a compliance program

- To eliminate discrimination in vocational education programs, administrators must distribute vocational education dollars equitably and must monitor those agencies which receive funds for compliance with civil rights legislation.

Monitor receivers of funds

NOTES

REQUIREMENTS FOR THE STATE AGENCY
(Questions 8-19)

Funding (Questions 13-16)

13. Are there funding constraints?

14. What type of funding is discriminatory?

15. What happens when discriminatory funding is found?

16. What other funding areas need consideration?

SELECTED RESOURCES: FUNDING

Hu, Teh-wei. *Studies of the Cost-efficiency and Cost-effectiveness of Vocational Education.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 186 609

McClure, Phyllis. *Race and Sex Compliance Issues in Vocational Education.* New York, NY: National Association for the Advancement of Colored People Legal Defense and Educational Fund, 1977. ED 154 199

U.S. Commission on Civil Rights. "To Extend Federal Financial Assistance" in the *Federal Civil Rights Enforcement Effort—1974.* Vol. VI. Washington, DC: U.S. Government Printing Office. November 1975.

QUESTION 13

ARE THERE FUNDING CONSTRAINTS?

- Funding formulas and other methods of distributing or allocating vocational education dollars must not result in discrimination on the basis of race, color, national origin, sex, or handicap.

  Must not result in discrimination

- Race, color, national origin, sex, or handicap can, however, influence allocation formulas provided that the factor of race, color, national origin, sex, or handicap is included "to compensate for past discrimination" *(Federal Register)* or to comply with the provisions of the Vocational Amendments of 1976 for these protected groups.

  Prohibited factors for funding

- The fact of "affirmative action funding" may serve to disprove unlawful discrimination in vocational education program dollar allocations.

  Affirmative action funding

NOTES

QUESTION 14

WHAT TYPE OF FUNDING IS DISCRIMINATORY?

- There is presumptive evidence of unlawful discrimination with respect to funding when a local receiver of funds enrolls a greater proportion of protected group students in its vocational education programs than the state-wide proportion of protected group students in vocational education, and yet receives a lower per-pupil ratio of funds than the state-wide per-pupil allocation.

Example of funding discrimination

NOTES

QUESTION 15

WHAT HAPPENS WHEN DISCRIMINATORY FUNDING IS FOUND?

- The Office for Civil Rights will require the state agency to adopt an alternative and nondiscriminatory method for distributing funds.
- The Office for Civil Rights may require affirmative action in future funding practices.

NOTES

Adopt alternative

QUESTION 16

WHAT OTHER FUNDING AREAS NEED CONSIDERATION?

- There are two other areas of funding that administrators should assess for unlawful discrimination. ▲ 8

- The first area is the distribution of vocational education dollars through competitive grants or contracts. Criteria for awarding grants or contracts must be established and applied without regard to race, color, national origin, sex, or handicap. Competitive grants and contracts

- A second area is the distribution of funds by means of competitive or discretionary grants. Information and technical assistance for applying for these grants must be made available to all applicants. Discretionary grants

NOTES

▲ = Transparency

REQUIREMENTS FOR THE STATE AGENCY
(Questions 8-19)

Monitoring (Questions 17-19)

17. How does the state agency monitor recipients?

18. Does noncompliance mean funds stop?

19. Does the state agency have other obligations?

SELECTED RESOURCES: MONITORING

American Civil Liberties Union of Georgia. "General Guidelines for Monitoring Vocational Education." Atlanta, GA: ACLU of Georgia, n.d.

American Civil Liberties Union of Georgia. "The Vocational Education Monitoring Project." Atlanta, GA: ACLU of Georgia, n.d.

Development of Model Methods of Administration (MOA) for the Implementation of the Office for Civil Rights Guidelines for Vocational Education. Final Report. Belmont, MA: CRC Education and Human Development, 1980. ED192044

Hopkins, Charles O. *Data Sources for Vocational Education Evaluation.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 548

QUESTION 17

HOW DOES THE STATE AGENCY MONITOR RECIPIENTS?

- The Guidelines state the requirement of the state agency to monitor receivers of vocational education dollars in terms of a compliance program.

▲9

- A compliance program must include:

Compliance Program

  a. Collecting and analyzing data and information related to civil rights

  a. Get data

  b. Conducting periodic reviews for civil rights compliance of selected local agencies or other receivers of vocational education dollars

  b. Review agencies

  c. Providing technical assistance to local agencies and other receivers of vocational education dollars upon request

  c. Provide technical assistance

  d. Periodically reporting monitoring activities and findings to the Office for Civil Rights

  d. Report periodically

NOTES

▲ = Transparency

QUESTION 18

DOES NONCOMPLIANCE MEAN FUNDS STOP?

- No. The state agency is not required to stop or defer financial assistance to any local agency because of a finding of civil rights violations; nor is the state agency required to conduct hearings on allegations of discrimination.

- Findings of noncompliance, however, must be reported to the Office for Civil Rights by the state agency.

NOTES

Not required to terminate funds

QUESTION 19

DOES THE STATE AGENCY HAVE OTHER OBLIGATIONS?

- Yes. The state agency is obligated to submit to the Office for Civil Rights the methods of administration (MOA) and related procedures it will follow to monitor receivers of vocational education dollars for compliance.

Methods of administration (MOA)

- The state agency is also obligated to submit an annual report of activities and findings to the Office for Civil Rights.

Annual report

NOTES

REQUIREMENTS FOR VOCATIONAL EDUCATION PROGRAMS (Questions 20-43)

Access to Facilities (Questions 20-28)

20. What topics do access and admissions include?
21. What restrictions are placed upon admissions policies?
22. How does locale affect equality of educational opportunity?
23. What restrictions affect the selection of sites?
24. What restrictions affect school boundaries?
25. What restrictions affect additions or renovations?
26. What must be done to remedy a discriminatory school location?
27. When is a vocational education center presumed to be unlawfully segregated?
28. How can segregated facilities be remedied?

SELECTED RESOURCES: ACCESS TO FACILITIES

Jernigan, Joan Shirley, and Clark, Donald L. *Assisting Handicapped Students in Vocational Technical Programs in Community Colleges.* Identification of Barriers; Recommendations for Removal of Barriers; Tasks to be Implemented. Final Report. Austin, TX: Texas A and M University, College Station, College of Education, 1978. ED 171 905

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Mistler, Sharon. *Planning for Implementation of Section 504 at Colleges and Universities.* Washington, DC: RRRI-ALLB, 1978. ED 155 841

Nondiscrimination on the Basis of Handicap in Programs and Activities Receiving or Benefiting from Federal Financial Assistance 45 C.F.R. 84 (1978).

Tindall, Lloyd W., and Gugerty, John J. *Least Restrictive Alternative for Handicapped Students.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 533

QUESTION 20

WHAT TOPICS DO ACCESS AND ADMISSIONS INCLUDE?

- Under the heading of access and admissions the Guidelines review several aspects of the vocational education enterprise in which unlawful discrimination is possible. In particular, the Guidelines note these areas:

  a. Admissions policies

  b. Location and accessibility of schools

  c. Segregated facilities

  d. Criteria for admission to programs

  e. Equal access to courses and programs for minority or handicapped students

  f. Annual announcement of policy of nondiscrimination

NOTES

Access and admissions
▲ 10

▲ = Transparency

QUESTION 21

WHAT RESTRICTIONS ARE PLACED UPON ADMISSIONS POLICIES?

- The state or local agency cannot develop, impose, maintain, approve, or implement any admissions policy that unlawfully discriminates on the basis of race, color, national origin, sex, or handicap.

- State and local agencies can provide for equality of educational opportunity by developing admissions policies that do not use race, color, national origin, sex, or handicap as criteria to determine student eligibility to participate in programs, to use facilities, or to attend schools.

NOTES

Cannot develop, impose, maintain, approve, or implement discrimination in admissions

QUESTION 22

HOW DOES LOCALE AFFECT EQUALITY OF EDUCATIONAL OPPORTUNITY?

School or facility location

- There are three aspects of school or facility location that bear upon providing equality of educational opportunity in vocational education. These aspects are:
  a. Accessibility to the school site
  b. Boundaries of the school district
  c. Additions or renovations to existing vocational education facilities

NOTES

QUESTION 23

WHAT RESTRICTIONS AFFECT THE SELECTION OF SITES?

- School sites or locations for vocational education facilities may not be selected or approved by state or local agencies in order to exclude, segregate, or discriminate against students on the basis of race, color, national origin, sex, or handicap.

Sites cannot exclude, segregate, or discriminate against students

- The school site must not identify the facility or program as being for nonminority or minority students.

Readily accessible to all students

NOTES

QUESTION 24

WHAT RESTRICTIONS AFFECT SCHOOL BOUNDARIES?

- School boundaries may not be established, approved, or maintained in order to exclude students on the basis of race, color, or national origin.

School boundaries

NOTES

43

QUESTION 25

WHAT RESTRICTIONS AFFECT ADDITIONS OR RENOVATIONS?

- Additions, modifications, or renovations of facilities cannot result in, maintain, or increase student segregation on the basis of race, color, national origin, sex, or handicap.

Eliminate segregation

NOTES

QUESTION 26

WHAT MUST BE DONE TO REMEDY A DISCRIMINATORY SCHOOL LOCATION?

- The Office for Civil Rights requires the submission of a plan to remedy discrimination because of inaccessible sites, wrongly drawn school boundaries, or segregated facilities.

▲ 11

- This plan may include:

Remedies for segregated schools

  a. Redrawing of boundaries to include areas unlawfully excluded and to exclude areas unlawfully included

  b. Transportation for students residing in areas unlawfully excluded

  c. Additional programs and services for students who would have been eligible for attendance at the school but for the discriminatory service area or site selection

  d. Reassignment of students

  e. Construction of new facilities or expansion of existing facilities *(Federal Register)*.

NOTES

▲ = Transparency

QUESTION 27

WHEN IS A VOCATIONAL EDUCATION CENTER PRESUMED TO BE UNLAWFULLY SEGREGATED?

- A vocational education school that enrolls mostly minority students or students of one race and that is open to all students within its boundaries is presumed unlawfully segregated:

  a. If it was established by a recipient for members of one race, national origin, or sex; or

  b. If it has been attended primarily by members of one race, national origin, or sex; or

  c. If most of its programs have traditionally been selected by members of one race, national origin, or sex.

Test of unlawful segregation

NOTES

QUESTION 28

HOW CAN SEGREGATED FACILITIES BE REMEDIED?

- The following steps may be included in a plan to eliminate unlawfully segregated facilities:

  a. Eliminate duplication of programs in nearby facilities.

  b. Relocate or "cluster" programs or courses.

  c. Add programs and courses that traditionally have been identified as intended for members of a particular race, national origin, or sex to schools that have traditionally served members of the other sex, of a different race, or a different national origin.

  d. Merge programs into one facility.

  e. Intensify protected group outreach, recruitment, and counseling.

  f. Provide free transportation to students whose enrollment would promote desegregation.

NOTES

Remedies for segregated schools

▲ 12

▲ = Transparency

REQUIREMENTS FOR VOCATIONAL EDUCATION PROGRAMS (Questions 20-43)

Access to Programs (Questions 29-32)

29. What criteria may not be used for admitting students?
30. How can administrators provide equal access to persons speaking limited English?
31. How can persons who speak limited English be identified?
32. How can administrators provide equal access to handicapped students?

SELECTED RESOURCES: ACCESS TO PROGRAMS

Center for Law and Education. *Bilingual/Bicultural Education: Inequality in Education.* Cambridge, MA: Center for Law and Education, February 1975.

Committee for the Handicapped. *Directory of Organizations Interested in the Handicapped 1976.* Washington, DC: People to People Program, 1976.

CRC Education and Human Development, Inc. *Civil Rights, Handicapped Persons, and Education: Section 504 Self-Evaluation Guide for Preschool, Elementary, Secondary, and Adult Education.* Belmont, MA: CRC Education and Human Development, 1978.

Davis, Sharon. *Vocational Education of Handicapped Students: A Guide for Policy Development.* Reston, VA: The Council for Exceptional Children, n.d. ED 159 851

Geffert, Hannah N., et al. *The Current Status of U.S. Bilingual Education Legislation.* Bilingual Education Series No. 4. Arlington, VA: Center for Applied Linguistics, 1975.

Hafen, Susan, and Degray, Gwen. *Evaluating Resources for Disadvantaged Students.* College Park, MD: University of Maryland, Maryland Vocational Curriculum Research and Development Center, 1979. ED 174767

Halloran, W., et al. *Vocational Education for the Handicapped: Resource Guide to Federal Regulations.* Washington, DC: Bureau of Occupational and Adult Education, 1977. ED 163 747

Hurwitz, A. *Bilingual Vocational Instructor Training.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 186 607

Kapes, Jerome T., and Greenwood, Katy L. "Walking the Tightrope of Student Selection." *VocEd* 54 (October 1979): 24-28.

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Office for Civil Rights. "Section 504 of the Rehabilitation Act of 1973 Fact Sheet: Handicapped Persons' Rights Under Federal Law." Washington, DC: Department of Health, Education and Welfare, Office of the Secretary, March 1978.

Weisgerber, Robert, ed. *Vocational Education: Teaching the Handicapped in Regular Classes.* Reston, VA: The Council for Exceptional Children, 1978. ED 149 028

QUESTION 29

WHAT CRITERIA MAY NOT BE USED FOR ADMITTING STUDENTS?

Admissions criteria

- The Guidelines prohibit the use of admissions criteria that have the effect of disproportionately excluding students on the basis of race, color, national origin, sex, or handicap.

- Criteria that have been used to exclude students include:

  a. Past academic performance
  b. Teachers' recommendations
  c. Disciplinary record
  d. Counselor's approval
  e. Interest inventories
  f. High school diploma
  g. Standardized tests (e.g., Test of Adult Basic Education, TABE)

Test for admissions criteria

- Admissions criteria like these can be used, however, and are nondiscriminatory:

  a. When validated as essential to participation in a specific program

  b. When "alternative equally valid criteria that do not have . . . a disproportionate adverse effect are unavailable" *(Federal Register)*

NOTES

QUESTION 30

HOW CAN ADMINISTRATORS PROVIDE EQUAL ACCESS TO PERSONS SPEAKING LIMITED ENGLISH?

• Program administrators must identify students with limited English language skills.	Identify LES ▲ 13
• "LES" means limited-English-speaking persons.	
• Program administrators must provide for the assessment of the ability of students with limited English language skills to participate in vocational education instruction.	Assess LES
• Program administrators must open all programs to students with limited English language skills.	Open programs to LES
• Admission to vocational education programs cannot be restricted because the applicant is a member of a national origin minority with limited English language skills.	Access to programs by LES

NOTES

▲ = Transparency

QUESTION 31

HOW CAN PERSONS WHO SPEAK LIMITED ENGLISH BE IDENTIFIED?

- Methods for identifying persons speaking limited English can include:
  a. Identification by administrative staff, teachers, or parents of secondary level students
  b. Identification by the student, if postsecondary
  c. Appropriate diagnostic procedures, if necessary

NOTES

Methods of identification

QUESTION 32

HOW CAN ADMINISTRATORS PROVIDE EQUAL ACCESS TO HANDICAPPED STUDENTS?

- Administrators must provide for the elimination of architectural or equipment barriers to program access by handicapped students.

- To maintain access for handicapped students, administrators must provide related aids and services such as transportation or developmental, corrective, and other supportive services (e.g., counseling or school health services).

- To ensure access to vocational education programs or activities by postsecondary handicapped students, administrators must provide auxiliary aids such as taped texts, readers in libraries, or adapted classroom equipment.

- When necessary to secure access for handicapped persons to vocational education programs and activities, administrators must:

  a. Modify instructional equipment

  b. Modify or adapt the manner in which the courses are offered

  c. House the program in facilities that are readily accessible to mobility-impaired students

  d. Provide auxiliary aids that effectively make lectures and necessary materials available to postsecondary handicapped students

  e. Provide related aids or services that ensure secondary students an appropriate education

- Administrators must ensure that handicapped persons are not denied access to vocational education programs because employment opportunities may be limited.

Equal access for handicapped:
▲ 14
Eliminate barriers

Provide related aids and services

Provide auxiliary aids

Other remedies

Equal employment opportunities

▲ = Transparency

REQUIREMENTS FOR VOCATIONAL EDUCATION PROGRAMS
(Questions 20-43)

Equal Educational Opportunity (Questions 33-39)

33. Must administrators announce a policy of nondiscrimination?
34. What points should this announcement contain?
35. What equal opportunity provisions are emphasized?
36. What accommodations must be provided for handicapped students?
37. How is student financial assistance restricted?
38. How is housing in residential postsecondary vocational education centers restricted?
39. To what extent must comparable facilities be provided?

SELECTED RESOURCES: EQUAL EDUCATIONAL OPPORTUNITY

Education Commission of the States. *Equal Rights for Women in Education.* Model Policy Statement and Guidelines for Implementation. Denver, CO: Vocational Education, 1977. ED166437

Equal Opportunities for Women. Paris: Organization for Economic Cooperation and Development, 1979. ED185242

Equality in Vocational Programs. Denver, CO: State Board for Community Colleges and Occupational Education, Occupational Education Division, 1979-80.

Guidelines for the Evaluation and Selection of Ethnically Valid Instructional Materials. Springfield, IL: Illinois Office of Education, Urban and Ethnic Education Section, 1975.

Harris, Brenda, and Wheeler, Lillian. *The Changing Roles of Males and Females: Curriculum Guide.* Richmond, KY: Eastern Kentucky University, Department of Home Economics, 1979. ED182557

Hayes, L. L. "The Adams Mandate: Is It a Blueprint for Equal Educational Opportunity?" *Phi Delta Kappan* 61 (April 1980):541-542.

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Huff, Millie. *Equal Vocational Opportunity.* Nashville, TN: Tennessee Department of Education, Division of Vocational/Technical Education, 1978. ED 162 088

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Kane, Roslyn D., and Frazee, Pamela E. *Women in Non-Traditional Education in Secondary Schools.* Arlington, VA: R.J. Associates, 1978.

McCune, Shirley, and Matthews, Martha, editors. *Implementing Title IX and Attaining Sex Equity: A Workshop Package for Elementary-Secondary Educators.* Washington, DC: U.S. Department of Health, Education, and Welfare, n.d. ED185 469-473

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Model Policy Statement and Guidelines for Implementation: Equal Treatment of Students. Denver, CO: Education Commission of the States, 1977. ED 164 411

Steiger, JoAnn M., and Schlesinger, Sue H. *Fostering Sex Fairness in Vocational Education: Strategies for Administrators.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 537

Twenty Years After Brown: A Report of the United States Commission on Civil Rights. Washington, DC: U.S. Commission on Civil Rights, 1975.

U.S. Office for Civil Rights. *Title IX Manual.* Washington, DC: Department of Health, Education, and Welfare, Secondary Education Division, 1975.

Women on Words and Images. *Guidelines for Sex-Fair Vocational Education Materials.* Washington, DC: U.S. Government Printing Office, 1979. ED 153 015

QUESTION 33

MUST ADMINISTRATORS ANNOUNCE A POLICY OF NONDISCRIMINATION?

- Administrators must publicize an announcement of nondiscrimination each year before school resumes.

  Announcement of nondiscrimination ▲15

- This announcement must be in native languages when the district has a fairly large minority community.

  In native languages

- This announcement should reach the general public, students, minority groups, women, and handicapped persons.

  Reach general public

- This policy may be announced through local newspapers, TV or radio, agency publications, or other media.

  Use variety of media

NOTES

▲ = Transparency

QUESTION 34

WHAT POINTS SHOULD THIS ANNOUNCEMENT CONTAIN?

- This announcement should contain:
  a. A brief summary of program offerings
  b. A brief summary of admissions criteria
  c. The name, address, and telephone number of the person designated to coordinate Title IX and Section 504 compliance activity

NOTES

Requirements for the annual announcement
▲ 16

▲ = Transparency

QUESTION 35

WHAT EQUAL OPPORTUNITY PROVISIONS ARE EMPHASIZED?

- Several provisions of Title IX and Section 504 relating to equal opportunity for students in vocational education programs or activities are reemphasized in the Guidelines. These provisions include:
  - a. Accommodations for handicapped students
  - b. Financial assistance to students
  - c. Residential housing
  - d. Comparable facilities

Equal opportunity:

accommodations,

financial assistance,

housing,

facilities

NOTES

QUESTION 36

WHAT ACCOMMODATIONS MUST BE PROVIDED FOR HANDICAPPED STUDENTS?

- At the secondary level, handicapped students must be placed in the regular educational environment of any vocational education programs to the maximum extent appropriate to the needs of the student.

Regular education environment
▲ 17
♦ 2

- When handicapped students cannot be placed in the regular classroom environment, state and local agencies must ensure that any separate facilities, programs, or services for handicapped students are comparable to those provided nonhandicapped students.

Comparable programs and facilities

- State and local agencies must ensure that the needs of handicapped students are assessed and must determine the nature and extent of any supplementary aids that the handicapped student may require.

Assessment of students

- State and local agencies must ensure that reasonable accommodations are made for handicapped students.

Reasonable accommodations

- Reasonable accommodations for handicapped students may include:
  a. Making facilities readily accessible and usable
  b. Modifying schedules
  c. Acquiring or modifying equipment or devices
  d. Providing readers or interpreters

- State and local agencies must provide safeguards for the education of handicapped students, including safeguards for evaluation, placement, and due-process proceedings.

Other safeguards

▲ = Transparency
♦ = Handout

QUESTION 37

HOW IS STUDENT FINANCIAL ASSISTANCE RESTRICTED?

- State and local agencies "may not award financial assistance . . . to vocational education students on the basis of race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination" *(Federal Register).*

  Nondiscrimination in financial assistance

- "Student financial assistance" includes loans, grants, scholarships, special funds, subsidies, compensation for work, or prizes.

  Examples of financial assistance

- State and local agencies may administer "restricted financial assistance" for students (i.e., financial aid established by certain legal instruments, such as wills or trusts) if the overall effect of all financial assistance is nondiscriminatory.

  "Restricted financial assistance"

- State and local agencies must ensure that financial aids information does not contain language or examples that are discriminatory.

- State and local agencies must ensure that financial aids information materials are in native languages when appropriate.

  Publicize financial aid in native languages

NOTES

QUESTION 38

HOW IS HOUSING IN RESIDENTIAL POSTSECONDARY VOCATIONAL EDUCATION CENTERS RESTRICTED?

- When state and local agencies extend housing opportunities, they must do so without discrimination based on race, color, national origin, sex, or handicap.

  Nondiscrimination in housing
  ▲ 18

- Both on-campus and off-campus housing opportunities must be available without discrimination.

  On-campus and off-campus housing

- Residential housing for students of one sex or for handicapped students must be comparable as a whole to housing provided students of the other sex or nonhandicapped students.

  Residential housing

- "Comparable as a whole" means proportionate in quantity, equal in quality, and at the same cost and under the same conditions.

  Comparable housing

NOTES

▲ = Transparency

QUESTION 39

TO WHAT EXTENT MUST COMPARABLE FACILITIES BE PROVIDED?

- State and local agencies must ensure that "changing rooms, showers, and other facilities for students of one sex . . . are comparable to those provided for students of the other sex" *(Federal Register)*.

Comparable facilities for both sexes

- Facilities "must be adapted or modified to the extent necessary to make the vocational education program readily accessible to handicapped persons" *(Federal Register)*.

Comparable facilities for handicapped

- Certain facilities may be separate because of sex, but separate facilities must be comparable.

Separate facilities for both sexes

NOTES

REQUIREMENTS FOR VOCATIONAL EDUCATION PROGRAMS (Questions 20-43)

Student Employment (Questions 40-43)

40. What role do agencies have in equal work experience opportunity?

41. What responsibilities do agencies have for student employment opportunities?

42. Are agencies prohibited from entering into agreements with apprenticeship sponsors?

43. What are the key provisions of the sponsor's assurance?

SELECTED RESOURCES: STUDENT EMPLOYMENT

"A Working Woman's Guide to Her Job Rights." Washington, DC: U.S. Department of Labor, Office of the Secretary, Women's Bureau, 1978. ED176138

Briggs, Norma. *Women in Apprenticeship—Why Not?* Washington, DC: U.S. Government Printing Office, 1975.

Briggs, Norma L. *Women and the Skilled Trades.* Information Series No. 132. Columbus, OH: ERIC Clearinghouse on Adult, Career, and Vocational Education, 1978. ED164975

Davis, Jayne H. *Strategies for Broadening the Scope of Career Choices for Females and the Handicapped.* Columbia, SC: South Carolina Department of Education, 1980. ED192028

Glover, Robert W. *Apprenticeship in the United States: Implications for Vocational Education Research and Development.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 189 448

Handbook for Teachers of Adult Occupational Education. Albany, NY: The University of the State of New York, State Education Department, Bureau of Occupational Education Curriculum Development, 1978. ED149160

R.J. Associates. *Problems of Women in Apprenticeship.* Arlington, VA: R.J. Associates, Inc., 1977.

Roby, Pamela Ann. *Toward Full Equality: More Job Education for Women.* Washington, DC: Department of Health, Education, and Welfare, Women's Research Division, 1978.

Schergens, Becky L. *The Parent's Role in Career Development: Implications for Vocational Education Research and Development.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 186 707

Steiger, JoAnn M., and Fink, Arlene. *Expanding Career Horizons.* Second Edition. Springfield, IL: Illinois State Board of Education, Department of Adult, Vocational and Technical Education, 1979.

Student Commitment to Educational Equity Project. *A Student Guide to Equal Rights.* Boston: Massachusetts Department of Education, Bureau of Student Services, 1979.

QUESTION 40

WHAT ROLE DO AGENCIES HAVE IN EQUAL WORK EXPERIENCE OPPORTUNITY?

- The discussions of student employment and work experience in the Guidelines focus on two areas:
  a. Work-study, cooperative vocational education, and job placement programs
  b. Apprenticeship training

NOTES

Equality of employment or work experience
▲ 19

▲ = Transparency

QUESTION 41

WHAT RESPONSIBILITIES DO AGENCIES HAVE FOR STUDENT EMPLOYMENT OPPORTUNITIES?

Student employment practices

- There are two chief responsibilities that state and local agencies exercise with respect to student employment opportunities.
- First, state and local agencies must ensure that they do not discriminate against students in making employment opportunities available.

Monitoring employers

- Second, state and local agencies must ensure that employers do not discriminate against students on the basis of race, color, national origin, sex, or handicap in:
  a. Recruitment
  b. Hiring
  c. Placement
  d. Assignment to work tasks
  e. Hours of employment
  f. Levels of responsibility
  g. Rates of pay
- The Guidelines prohibit a state or local agency from honoring "any employer's request for students who are free of handicaps or for students of a particular race, color, national origin, or sex" *(Federal Register)*.

NOTES

QUESTION 42

ARE AGENCIES PROHIBITED FROM ENTERING INTO AGREEMENTS WITH APPRENTICESHIP SPONSORS?

- The Guidelines do not prohibit state or local agencies from entering into agreements with sponsors of apprenticeship programs, but the Guidelines set forth qualifications on such agreements.

Agreements with unions and apprenticeship sponsors

- The Guidelines prohibit agreements between state or local agencies and unions or sponsors of apprentice training programs if the labor union or sponsor discriminates against its members on the basis of race, color, national origin, sex, or handicap.

- Written agreements between state or local agencies and unions or sponsors of apprentice training programs must contain an assurance of nondiscrimination by the union or sponsor.

Written agreements with an assurance

NOTES

QUESTION 43

WHAT ARE THE KEY PROVISIONS OF THE SPONSOR'S ASSURANCE?

- There are two main provisions that the assurance must contain:

  a. A statement that the union or sponsor of apprenticeship training does not engage in discrimination against its members — Statement of nondiscrimination policy

  b. A statement that the union or sponsor of apprenticeship training will offer and conduct its training free of discrimination — Statement of nondiscrimination in fact

NOTES

REQUIREMENTS FOR COUNSELORS
(Questions 44-48)

44. Which functions of counseling are discussed?

45. What responsibility do agencies have for counseling and prevocational programs?

46. What direction can agencies provide counselors?

47. What responsibility do agencies have for student recruitment activities?

48. What obligation do agencies have for promotional activities?

SELECTED RESOURCES: REQUIREMENTS FOR COUNSELORS

American Institutes for Research. *Classroom Activities to Combat Stereotyping in Career Choice.* Palo Alto, CA: American Institutes for Research, 1980. ED 187887

An Equal Chance: A Parent's Introduction to Sex Fairness in Vocational Education. Washington, DC: U.S. Government Printing Office, 1978. ED 164 972

Charters, Margaret A. *Vocational Education for Older Adults.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. ED 187 847

Dahl, Peter R., et al. *Mainstreaming Guidebook for Vocational Educators Teaching the Handicapped.* Palo Alto, CA: The American Institutes for Research in the Behavioral Sciences, 1978.

Equal Is Better: A Vocational Education Guide to Sex Fairness Resources and the Law. Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 186 716

Expanding Adolescent Role Expectations: Information, Activities, Resources for Vocational Educators. Revised edition. Ithaca, NY: Cornell University, Community Service Education Department, 1978. ED 147 544

Guidance, Counseling, and Support Services for High School Students with Physical Disabilities. Cambridge, MA: Technical Education Research Centers, Special Needs Program, 1977. ED 149 561

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Kowle, C. P. *Job Placement and Adjustment of the Handicapped: An Annotated Bibliography.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 173 536

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Sitlington, Patricia L., and Wimmer, Diane. "Vocational Assessment Techniques for the Handicapped Adolescent." *Career Development for Exceptional Individuals,* Vol. 1, No. 2. Reston, VA: Council on Exceptional Children, 1978.

Smith, Laneta J., ed. *Manual for Recognizing Sex Bias in Instructional Materials and Administrative Procedures.* Chicago, IL: Illinois Office of Education, Urban and Ethnic Education Section, n.d. ED 176 707

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Vetter, Louise; Burkhardt, Carolyn; and Sechler, Judith. *Sex Equity Strategies.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1980. 2nd Ed.

Vetter, Louise; Burkhardt, Carolyn; and Sechler, Judith. *A Guide for Vocational Education Sex Equity Personnel.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1978. ED 173 604

"Why Women Work." Washington, DC: U.S. Department of Labor, Office of the Secretary, Women's Bureau, 1978.

Wootton, Linda Spence. "The Age Discrimination in Employment Act: Implications for Education Leaders." *Phi Delta Kappan* 61 (April 1980):525-526.

"20 Facts on Women Workers." Washington, DC: U.S. Department of Labor, Office of the Secretary, Women's Bureau, 1978.

QUESTION 44

WHICH FUNCTIONS OF COUNSELING ARE DISCUSSED?

- The components of counseling discussed in the Guidelines are:
  a. Counseling and prospects for success
  b. Student recruitment activities
  c. Counseling of students with limited-English-speaking ability or hearing impairments
  d. Promotional activities

NOTES

▲ 20 ♦ 3

Counseling,

recruitment,

promotional activities

▲ = Transparency
♦ = Handout

QUESTION 45

WHAT RESPONSIBILITY DO AGENCIES HAVE FOR COUNSELING AND PREVOCATIONAL PROGRAMS?

- State and local agencies "must ensure that their counseling materials and activities, . . . promotional, and recruitment efforts do not discriminate on the basis of race, color, national origin, sex, or handicap" *(Federal Register).*

- "Counseling activities" include student program selection and career or employment selection.

NOTES

Nondiscrimination in counseling materials
♦4 ♦5

♦ = Handout

QUESTION 46

WHAT DIRECTION CAN AGENCIES PROVIDE COUNSELORS?

- State and local agencies must "ensure that counselors do not direct or urge any student to enroll in a particular career or program" *(Federal Register)*.

♦ 6

- State and local agencies must ensure that tests or other instruments that measure or predict a student's prospects for success in any career or program are not discriminatory with respect to race, color, national origin, sex, or handicap.

Student career or program selection

- State and local agencies must ensure that handicapped students are not directed toward more restrictive career or employment objectives than nonhandicapped students with similar interests and abilities.

Equal opportunity to select by handicapped

- State and local agencies must ensure that any disproportional enrollment in vocational education programs is not the result of unlawful discrimination in counseling activities.

NOTES

♦ = Handout

QUESTION 47

WHAT RESPONSIBILITY DO AGENCIES HAVE FOR STUDENT RECRUITMENT ACTIVITIES?

- State and local agencies must conduct student recruitment activities so as not to exclude or limit opportunities on the basis of race, color, national origin, sex, or handicap.

  Equal opportunity in recruitment

- State and local agencies must ensure that counselors provide a broad range of occupational opportunities to students during presentations.

  Present broad range of opportunity

- For example, recruiting teams "should include persons of different races, national origins, sexes, and handicaps" *(Federal Register)*.

  Mixed recruiting teams

NOTES

QUESTION 48

WHAT OBLIGATION DO AGENCIES HAVE FOR PROMOTIONAL ACTIVITIES?

- State and local agencies must distribute promotional literature in native languages when appropriate.

  Promotional literature in native languages

- Promotional efforts (including activities of school officials, counselors, and vocational staff) may not create or perpetuate stereotypes or other limitations based on race, color, national origin, sex, or handicap.

  Eliminate stereotypes in recruiting

- "Promotional efforts" include career days, parents' night, shop demonstrations, visitations by groups of prospective students and by representatives from business and industry.

  Definition of "promotional efforts"

NOTES

MISCELLANEOUS
(Questions 49-51)

49. What obligation do agencies have to their faculty and staff?

50. Are proprietary vocational education schools covered?

51. Where can I get help with the Guidelines?

SELECTED RESOURCES: REQUIREMENTS FOR EMPLOYMENT PRACTICES

O'Toole, J. Corbett, and Weeks, CeCe. *What Happens After School? A Study of Disabled Women and Education.* San Francisco: Educational Equity Communications Network, 1978.

U.S. Department of Labor, Office of the Secretary, Women's Bureau. *Brief Highlights of Major Federal Laws and Order on Sex Discrimination in Employment.* Washington, DC: U.S. Government Printing Office, 1980.

SELECTED RESOURCES: PROPRIETARY SCHOOLS

Tolbert, Jack F. *The Role of Private Trade and Technical Schools in a Comprehensive Human Development System: Implications for Research and Development.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979. ED 186 712

SELECTED RESOURCES: WHERE TO GO FOR HELP

Budke, Wesley E., project director. *Vocational Education Personnel: A Directory—1980.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, September 1980.

QUESTION 49

WHAT OBLIGATION DO AGENCIES HAVE TO THEIR FACULTY AND STAFF?

• The responsibility of state or local agencies with respect to the employment of faculty and staff spreads across recruitment practices, salary policies, and employment opportunities for handicapped applicants.	Equal opportunity in recruiting, paying, and employing
• In general, state or local agencies cannot practice discrimination in hiring any employee or applicant based on race, color, national origin, sex, or handicap.	Nondiscrimination in hiring
• State and local agencies must search out or recruit faculty and staff from a variety of schools, communities, or companies that are not disproportionately composed of persons of a particular race, color, national origin, sex, or handicap, except to overcome the effects of past discrimination.	
• State and local agencies must ensure that salary policies are based upon the conditions and responsibilities of employment.	Salary based on conditions of job
• State and local agencies "must provide equal employment opportunities for teaching and administrative positions to handicapped applicants who can perform the essential functions of the position in question" *(Federal Register)*.	Equal employment opportunity for handicapped
• State and local agencies "must take steps to overcome the effects of past discrimination in the recruitment, hiring, and assignment of faculty" *(Federal Register)*.	
• "State Advisory Councils of Vocational Education are recipients of federal financial assistance and therefore must comply with . . . the Guidelines" with respect to program staffing *(Federal Register)*.	State Advisory Councils of Vocational Education must comply

QUESTION 50

ARE PROPRIETARY VOCATIONAL EDUCATION SCHOOLS COVERED?

- Proprietary schools that receive federal financial assistance are required to adhere to the provisions of the Guidelines. — Proprietary schools must adhere to Guidelines
- Proprietary schools are private (i.e., not public or nonprofit) vocational education institutions. — Definition
- Complaints against proprietary schools based on Title VI are under the jurisdiction of the Veterans Administration; complaints against proprietary schools based on Title IX and Section 504 are under the jurisdiction of the Office for Civil Rights. — Where to direct complaints

NOTES

QUESTION 51

WHERE CAN I GET HELP WITH THE GUIDELINES?

- At the federal level, vocational education personnel can obtain assistance to implement the provisions of the Guidelines or answers to questions of compliance from the Office for Civil Rights in Washington, DC, or from the Department of Health and Human Services, Regional Offices for Civil Rights.

- At the state level, vocational education personnel can obtain assistance to implement the provisions of the Guidelines or answers to questions of compliance from their State Office of Civil Rights.

♦ 7

NOTES

♦ = Handout

LIST OF TRANSPARENCY MASTERS

▲ 1 Federal Register Title Page

▲ 2 Federal Legislation Prohibiting Discrimination: TITLE VI

▲ 3 Federal Legislation Prohibiting Discrimination: TITLE IX

▲ 4 Federal Legislation Prohibiting Discrimination: SECTION 504

▲ 5 What? Who? Why? When?

▲ 6 Principle of Nondiscrimination

▲ 7 Chief State Agency Civil Rights Responsibility Areas

▲ 8 Funding Responsibility

▲ 9 Monitoring Responsibility: Compliance Program

▲ 10 Access and Admissions

▲ 11 Remedy for Access and Admissions

▲ 12 Remedy for Segregated Facilities

▲ 13 Remedy for Exclusion of National Origin Minority Students With Limited English Language Skills

▲ 14 Remedy for Exclusion of Handicapped Persons

▲ 15 Announcement Requirements

▲ 16 Annual Announcement of Policy of Nondiscrimination

▲ 17 Reasonable Accommodations

▲ 18 Equal Opportunity for Students

▲ 19 Student Work Experience

▲ 20 The Guidelines on Counseling

federal register

WEDNESDAY, MARCH 21, 1979

DEPARTMENT OF HEALTH, EDUCATION, AND WELFARE

Office for Civil Rights

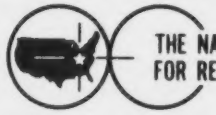
Office of the Secretary

■

VOCATIONAL EDUCATION PROGRAMS GUIDELINES FOR ELIMINATING DISCRIMINATION AND DENIAL OF SERVICES ON THE BASIS OF RACE, COLOR, NATIONAL ORIGIN, SEX AND HANDICAP

FEDERAL LEGISLATION PROHIBITING DISCRIMINATION: TITLE VI

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964: "No person in the United States shall, on the ground of race, color or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."



FEDERAL LEGISLATION PROHIBITING DISCRIMINATION: TITLE IX

TITLE IX OF THE EDUCATION AMENDMENTS OF 1972: "No person . . . shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

(T4)

FEDERAL LEGISLATION PROHIBITING DISCRIMINATION: SECTION 504

SECTION 504 OF THE REHABILITATION ACT OF 1973: "No otherwise qualified handicapped individual . . . shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

WHAT? WHO? WHY? WHEN?

WHAT?

OCR GUIDELINES

WHO?

VOCATIONAL EDUCATION PROGRAM PERSONNEL

WHY?

TO END DISCRIMINATION

WHEN?

EFFECTIVE NOW

PRINCIPLE OF NONDISCRIMINATION

Recipients of Federal funds for vocational education programs or activities cannot engage or participate in unlawful discrimination.

CHIEF STATE AGENCY
CIVIL RIGHTS RESPONSIBILITY AREAS

a. Funding: Equitable distribution of federal funds to provide equal educational opportunity.

b. Monitoring: Review and monitoring of receivers of Federal funds for civil rights compliance.

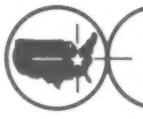
FUNDING RESPONSIBILITY

a. Allocation formulas

b. Competitive grants or contracts

c. Discretionary grants

d. Awards



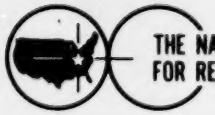
MONITORING RESPONSIBILITY: COMPLIANCE PROGRAM

a. Collect and analyze civil-rights-related data and information

b. Conduct periodic compliance reviews

c. Provide technical assistance

d. Report activities and findings to OCR



ACCESS AND ADMISSIONS

a. Admissions policy

b. School location and accessibility

c. Segregated facilities

d. Admissions criteria

e. Access for minority and handicapped

f. Annual announcement

REMEDY FOR ACCESS AND ADMISSIONS

a. Redraw school boundaries

b. Provide transportation

c. Increase program offerings

d. Reassign students

e. Construct new facilities

REMEDY FOR SEGREGATED FACILITIES

a. Eliminate duplication of programs

b. Relocate programs

c. Add nontraditional courses

d. Merge programs of several facilities

e. Use outreach, recruitment, and counseling

f. Provide free transportation

REMEDY FOR EXCLUSION OF NATIONAL ORIGIN MINORITY STUDENTS WITH LIMITED ENGLISH LANGUAGE SKILLS

a. Identify LES

b. Assess LES program participation skills

c. Open all programs to LES

d. Provide unrestricted program admission to LES

REMEDY FOR EXCLUSION OF HANDICAPPED PERSONS

a. Modify instructional equipment

b. Modify or adapt programs

c. Provide courses in accessible facilities

d. Provide auxiliary aids

e. Provide related aids

ANNOUNCEMENT REQUIREMENTS

a. Announce yearly before school resumes

b. Place announcement in local papers, television, agency publication, etc.

c. Reach the general public

d. Use native languages

ANNUAL ANNOUNCEMENT OF POLICY OF NONDISCRIMINATION

a. Brief summary or overview of program offerings

b. Brief summary or overview of admissions standards

c. Name, address, and telephone number of coordinator of Title IX and Section 504 compliance activities

REASONABLE ACCOMMODATIONS

a. Making facilities readily accessible and usable

b. Modifying schedules

c. Acquiring or modifying equipment or devices

d. Providing readers or interpreters

EQUAL OPPORTUNITY FOR STUDENTS

a. Accommodations for handicapped students

b. Financial assistance to students

c. Residential housing

d. Comparable facilities

STUDENT WORK EXPERIENCE

a. Work study

b. Cooperative vocational education

c. Job placement programs

d. Apprentice training

THE GUIDELINES ON COUNSELING

a. Counseling and prospects for success

b. Student recruitment activities

c. Counseling of students with limited English-speaking ability or hearing impairments

d. Promotional activities

LIST OF AUDIENCE HANDOUT MASTERS

- ♦ 1 Federal Legislation Prohibiting Discrimination
- ♦ 2 The Handicapped
- ♦ 3 Strategies for Counselors
- ♦ 4 Sex Equity Strategies
- ♦ 5 Strategies to Assist the Handicapped
- ♦ 6 Checklist for Equal Opportunity
- ♦ 7 Civil Rights Offices

FEDERAL LEGISLATION PROHIBITING DISCRIMINATION

TITLE VI OF THE CIVIL RIGHTS ACT OF 1964: "No person in the United States shall, on the ground of race, color, or national origin, be excluded from, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

TITLE IX OF THE EDUCATION AMENDMENTS OF 1972: "No person . . . shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance."

SECTION 504 OF THE REHABILITATION ACT OF 1973: "No otherwise qualified handicapped individual . . . shall, solely by reason of his handicap, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

THE HANDICAPPED

- Remember that the handicapped are their own persons.
- Remember that each person who is handicapped is different, and no matter what label is attached for the convenience of others, is still a totally unique person.
- Remember that persons with handicaps are persons first and handicapped individuals second. These persons have the same right to self-actualization as any others.
- Remember that the handicapped have the same needs that you have: to love and be loved, to learn, to share, to grow and to experience, in the same world you live in. They have no separate world. There is only one world.
- Remember that the handicapped have the same right as you to fall, to fail, to suffer, to cry, to curse, to despair. To protect them from these experiences is to keep them from life.
- Remember that only those who are handicapped can show or tell you what is possible for them. We who serve them must be attentive, attuned observers.
- Remember that the handicapped must do for themselves. We can supply the alternatives, the possibilities, the necessary tools—but only they can put these things into action. We can only stand fast, be present to reinforce, encourage, hope and help, when we can.
- Remember that the handicapped, like ourselves, are entitled to life as they know it. They, too, must decide to live it fully in peace, joy and love, with what they are and what they have, or to sit back in apathy and await death.
- Remember that persons with handicaps, no matter how handicapped, have a limitless potential for becoming—not what we desire them to become, but what is within them to become.
- Remember that the handicapped must find their own manner of doing things. There are many ways of tying shoes, drinking from a glass, finding one's way to a bus stop. There are many ways of learning and adjusting. They must find the best way for them.
- Remember that the handicapped also need the world, and others, in order to learn. All learning does not take place in the protected environment of the home or in a classroom, as many people believe. The world is a classroom. All of mankind are teachers. There is no meaningless experience.
- Remember that all persons with handicaps have a right to honesty about themselves, about you, and about their condition. To be dishonest with them is the most terrible disservice one can perform. Honesty forms the only solid base upon which all growth can take place.

Adapted from Buscaglia, Leo. *The Disabled and Their Parents: A Counseling Challenge.* As quoted in *Guidance, Counseling, and Support Services.* Cambridge, MA: Technical Education Research Centers, 1977.

STRATEGIES FOR COUNSELORS

- Present a wide range of program or career choices to all students.
- Avoid using minority status, sex, or handicapping conditions as measurements or indicators of student success in programs or activities.
- Provide students with a variety of information about programs and opportunities.
- Avoid restricting the career objectives of any individual.
- Offer the same kind of counseling and guidance to handicapped students as to nonhandicapped students.
- Present a wide array of program and career choices to handicapped students.
- Maintain respect for the occupational and career interests and aspirations of all students.
- Offer guidance, counseling, and support to all students interested in nontraditional careers or occupations.

SEX EQUITY STRATEGIES

- Inform yourself of the facts of women's employment.
- Confront your biases in formal training experiences and in informal discussions.
- Challenge the developers of counseling, career information, and testing materials to eliminate sex-stereotyping in their products.
- Learn about the developmental status of women clients, and work on basic problems of self-definition and motivation before providing career materials, testing, and career education experiences.
- Encourage females to enter basic courses in mathematics and science.
- Encourage women to keep their options open until they are ready to make choices.
- Develop and use support groups for women facing common problems.

Adapted from Harmon, Lenore W. *The Guidance Needs of Women.* Columbus, OH: The Ohio State University, National Center for Research in Vocational Education, 1979.

STRATEGIES FOR COUNSELORS TO ASSIST THE HANDICAPPED

- Become familiar with guidelines, programs, and services for handicapped students.
- Emphasize the importance of individual differences and abilities.
- Modify methods, materials, and curricula in order to provide handicapped students with successful classroom experiences.
- Develop classroom experiences which are based on performance level as a means of evaluation.
- Integrate services and programming for handicapped students.
- Coordinate opportunities for handicapped students to become involved in appropriate vocational training and job placement.
- Develop classroom guidance activities.
- Select and administer batteries of tests dealing with interests and vocational potential.

Adapted from Lennon, Thelma C. *Guidance Needs of Special Populations.*

CHECKLIST FOR EQUAL OPPORTUNITY

YES	NO	
☐	☐	1. Both sexes are encouraged to enter and to be admitted equally to all vocational education programs, activities, and facilities.
☐	☐	2. The curriculum offering in no way indicates that certain programs are only for boys, others only for girls.
☐	☐	3. The curriculum offerings meet a wide range of interests and abilities.
☐	☐	4. Minorities and handicapped persons of either sex are encouraged and actively recruited for programs.
☐	☐	5. Career choice materials offer a wide variety of options for both boys and girls, including minority and handicapped students.
☐	☐	6. Different sets of manners and behaviors are expected of male and female students in vocational programs.
☐	☐	7. Texts and illustrations show women and men performing the same or similar duties, and include minority or handicapped persons in the vocational education setting or in occupations or careers.
☐	☐	8. Staff development inservice programs have been conducted to develop sensitivities in counselors toward civil rights responsibilities.
☐	☐	9. There is an active recruitment program in those occupational areas that are not generally chosen by one sex.
☐	☐	10. Program content has been redesigned to appeal to students of both sexes.
☐	☐	11. Cooperative programs provide equal enrollment opportunities for both sexes, for minority group students, and for handicapped students.
☐	☐	12. Vocational education public relations materials are currently screened for sex bias, equal representation of males and females, of minority groups, and of handicapped persons.

Adapted from Education Commission of the States. *Model Policy Statement and Guidelines for Implementation: Guidance and Counseling.*

CIVIL RIGHTS OFFICES

- Vocational education personnel can obtain assistance to implement the provisions of the Guidelines or answers to questions of compliance.

Federal Assistance

- THE OFFICE FOR CIVIL RIGHTS IN WASHINGTON, DC
  David Gerard
  Office of Standards, Policy, and Research
  Department of Health, Education, and Welfare
  Office for Civil Rights
  330 Independence Avenue, S.W.
  Washington, DC 20201
  (202) 245-9177

- DEPARTMENT OF HEALTH AND HUMAN RESOURCES REGIONAL OFFICES FOR CIVIL RIGHTS

  Region I

  (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont):

  Robert Randolph
  Acting Director for Education
  14th Floor
  140 Federal Street
  Boston, Massachusetts 02110
  (617) 223-6397

  Region II

  (New Jersey, New York, Puerto Rico, Virgin Islands):

  Department of Education
  Office of Civil Rights
  Room 33130
  26 Federal Plaza
  New York, New York 10007
  (212) 264-4633

Region III

(Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia):

Dr. Robert A. Smallwood, Regional Administrator
Department of Education
Office for Civil Rights Director
Gateway Building
3535 Market Street
Post Office Box 13716
Philadelphia, Pennsylvania 19101
(215) 596-6772

Region IV

(Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee):

William H. Thomas, Director
Department of Education
Office for Civil Rights
101 Marietta Street
10th Floor
Atlanta, Georgia 30323
(404) 221-5934

Region V

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Kenneth A. Mines, Director
U.S. Department of Education
Office for Civil Rights
8th Floor
300 South Wacker Drive
Chicago, Illinois 60606
(312) 353-2521

Region VI

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1200 Main Tower Building
Dallas, Texas 75202
(214) 655-3951

Region VII

(Iowa, Kansas, Missouri, Nebraska):

Jesse L. High, Director
Twelve Grand Building
7th Floor
1150 Grand Avenue
Kansas City, Missouri 64106
(816) 374-2474

Region VIII

(Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming):

Vada Kyle-Holmes, Acting Director
Federal Office Building, Room 1194
1961 Stout Street
Denver, Colorado 80294
(303) 837-2025

Region IX

(Arizona, California, Hawaii, Nevada):

Robert L. Brown, Acting Director
1275 Market Street
San Francisco, California 94103
(415) 556-8586

Region X

(Alaska, Idaho, Oregon, Washington):

Virginia P. Apodaca, Regional Director
Office for Civil Rights
Department of Health and Human Services
Arcade Plaza Building MS 723
1321 Second Avenue
Seattle, Washington 98101
(206) 442-0473

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• STATE OFFICES OF CIVIL RIGHTS DIRECTORS

Alabama

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Technical Assistance
State Department of Education
Montgomery, AL 36130
(205) 832-3130

Alaska

Neil Thomas
Alaska State Commission of Human Rights
204 East Fifth Avenue, Room 213
Anchorage, AK 99501
(907) 276-7474

Arkansas

Shirley Stancil, Associate Director
Division of Personnel
State Department of Education
Arch Ford Foundation Building
Capitol Mall
Little Rock, AR 72201
(501) 371-1546

California

Brent Aikin, Administrator
Vocational Education Support Services Section
State Department of Education
721 Capitol Mall, Fourth Floor
Sacramento, CA 95814
(916) 322-2332

Connecticut

Chief
Bureau of Legal and Regulatory Services
State Department of Education
P.O. Box 2219
Hartford, CT 06115
(203) 566-3673

Florida

Nancy Benda, Director
Equal Educational Opportunity Programs
State Department of Education
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Tallahassee, FL 32301
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Gloria Grier
Equal Employment Opportunity/
Affirmative Action Officer
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State Board for Vocational Education
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(317) 232-2612

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Program Accountability
Maryland State Department of Education
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Baltimore, MD 21201
(301) 659-2032

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Michigan Department of Civil Rights
1000 Billy Farnum Building
Lansing, MI 48913
(517) 373-7634

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Archie Holmes, Manager
Equal Educational Opportunities
State Department of Education
Capitol Square Building, Room 630
St. Paul, MN 55101
(612) 296-5020

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Carol Hiskey
Office of Civil Rights
301 Centennial Mall South
Lincoln, NE 68509
(402) 471-2441

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Victoria Richart, Consultant
Equal Education Opportunity
64 North Main Street
Concord, NH 03301
(603) 271-2130

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Philip Felix
State Department of Education
Sante Fe, NM 87503
(505) 827-3151

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Douglas Adamson
State Department of Education
Twin Towers, Room 1623
Albany, NY 12230
(518) 474-4686

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Assistant Director of Vocational Education
State Board for Vocational Education
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Office of Civil Rights
Special Needs Service
65 South Front Street, Room 913
Division of Vocational Education
Columbus, OH 43215
(614) 466-4835

Oklahoma

William Rose, Director
Human Rights Commission
Jim Thorpe Building, Room G-11
Oklahoma City, OK 73105
(405) 521-2360

Oregon

Larry Mylnechuk, Specialist
Equal Education and Legal
State Department of Education
700 Pringle Parkway, SE
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Harrisburg, PA 17126
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Robert L. Bailey, IV
Affirmative Action Officer
State Department of Education
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(401) 277-2691

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Pete Fallesen, Assistant Director
Division of Vocational Education
Richard F. Kneip Building
Pierre, SD 57501
(605) 773-4719

Tennessee

Troy Jones
Cordell Hull Building, Room 116
Nashville, TN 37219
(615) 741-3248

Texas

W. H. Fitz, Director
Program Support Services
Department of Occupational Education
and Technology
Texas Education Agency
201 East Eleventh Street
Austin, TX 78701
(512) 475-3129

Utah

Frank Blair, Specialist
Apprenticeship Placement and Office of Civil Rights
Utah State Office of Education
250 East Fifth South
Salt Lake City, UT 84111
(801) 533-5371

Vermont

Richard E. Higgins, MAO Coordinator
Vocational Technical Education Division
Vermont Department of Education
State Office Building
120 State Street
Montpelier, VT 05602
(802) 828-3101

West Virginia

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Office of Civil Rights
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State Department of Education
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Puerto Rico

Attorney Eddie Salich, Executive Director
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(809) 764-8686

Virgin Islands

Aubrey Roebuck, Director
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